

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

GAMAL ABDELAZIZ

No. 1:19-MJ-06087-MPK-3

**DEFENDANT GAMAL ABDELAZIZ'S MOTION TO
MODIFY PRETRIAL CONDITIONS TO ALLOW
INTERNATIONAL BUSINESS TRAVEL**

Defendant Gamal Abdelaziz respectfully requests that this Court modify his conditions of pretrial release to allow him to retain control of his U.S. passport and to travel internationally **solely for business purposes** with prior notice to Pretrial Services, pursuant to 18 U.S.C. §§ 3145(a)(2) and 3142(b)-(c). As outlined in the supporting Memorandum, Mr. Abdelaziz is not a flight risk and has longstanding ties to the Las Vegas, Nevada area. Importantly, such a modification would be consistent with the conditions this Court has placed on other defendants in this matter. *See* ECF 17 (regarding defendant Hodge).

As a first request, Mr. Abdelaziz respectfully requests permission to travel to Cabo, Mexico for business purposes (i.e., the development of a new resort) during the first week of April 2019.

Respectfully submitted,

GAMAL ABDELAZIZ

By his attorneys,

/s/ Brian T. Kelly
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Dated: March 28, 2019

LOCAL RULE 7.1(A)(2) CERTIFICATION

I hereby certify that I conferred with counsel for the government in an attempt to resolve or narrow the issues raised by this motion and the government has notified me that it will oppose all defendants' motions for international travel.

/s/ Brian T. Kelly
Brian T. Kelly

CERTIFICATE OF SERVICE

I hereby certify that a copy of the forgoing was filed electronically on March 28, 2019, and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing.

/s/ Brian T. Kelly
Brian T. Kelly